

# Exhibit A

NASHVILLE, TENNESSEE

Service ID 468035

STATE OF TENNESSEE  
DAVIDSON COUNTY  
20<sup>TH</sup> JUDICIAL DISTRICT

LUCAS, IAN HUNTER

Plaintiff

vs.

VANDERBILT UNIVERSITY  
2100 WEST END AVENUE  
SUITE 1100  
NASHVILLE, TN 37203

Defendant

CIVIL ACTION  
DOCKET NO. 24C2481  
Method of Service:  
Davidson County Sheriff

RECEIVED  
OCT 17 2024

Vanderbilt University  
Office of the General Counsel

To the above named Defendant:

You are summoned to appear and defend a civil action filed against you in the Circuit Court, 1 Public Square, Room 302, P.O. Box 196303, Nashville, TN 37219-6303, and your defense must be made within thirty (30) days from the date this Summons is served upon you. You are further directed to file your defense with the Clerk of the Court and send a copy to the Plaintiff's attorney at the address listed below.

In case of your failure to defend this action by the above date, judgment by default will be rendered against you for the relief demanded in the Complaint.

ISSUED: 10/15/2024

JOSEPH P. DAY  
Circuit Court Clerk  
Davidson County, Tennessee

By: 

Deputy Clerk

ADDRESS OF PLAINTIFF'S ATTORNEY OR PLAINTIFF:

IAN HUNTER LUCAS  
221 CHARLESTON AVE  
PLEASANT VIEW, TN 37146

SERVICE  
BY SHERIFF

NOTICE TO THE DEFENDANT:

Tennessee law provides a Ten Thousand and 00/100 Dollars (\$10,000.00) debtor's equity interest personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.



To request an ADA accommodation, please contact Trey Collier at (615) 880-3309

rev. 09/01/2022

**IN THE CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE  
FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE**

**IAN HUNTER LUCAS,  
Plaintiff,**

**v.**

**VANDERBILT UNIVERSITY**

**and**

**VANDERBILT UNIVERSITY SCHOOL OF NURSING,  
Defendants.**

**RECEIVED**

**OCT 17 2024**

**Vanderbilt University  
Office of the General Counsel**

**VERIFIED COMPLAINT  
JURY DEMAND ENDORSED HEREIN  
UNDER SEAL AND IN CHAMBER REVIEW**

**SERVICE  
BY SHERIFF**

**FCA NOTICE OF FILING UNDER SEAL**

Pursuant to 31 U.S.C. § 3730(b)(2), this Verified Complaint is being filed under seal. The contents herein contain confidential, sensitive, or proprietary information, including but not limited to personal health information (PHI) subject to the Health Insurance Portability and Accountability Act (HIPAA) and other privacy regulations. Access to this document is restricted and it shall remain under seal until further order of the Court.

**IN THE CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE  
FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE**

**IAN HUNTER LUCAS,  
Plaintiff,  
v.  
VANDERBILT UNIVERSITY  
and  
VANDERBILT UNIVERSITY SCHOOL OF NURSING,  
Defendants.**

**Case No. \_\_\_\_\_  
VERIFIED COMPLAINT  
JURY DEMAND ENDORSED HEREIN  
UNDER SEAL AND IN CHAMBER REVIEW**

**I. INTRODUCTION**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## II. JURISDICTION

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## III. PARTIES

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

#### STATUTE OF LIMITATIONS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

#### EXHAUSTION OF ADMINISTRATIVE REMEDIES

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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**CONFIDENTIALITY AND HIPAA COMPLIANCE**

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

#### IV. GENERAL ALLEGATIONS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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A series of horizontal black bars of varying lengths and positions, resembling a barcode or a stylized text representation. The bars are arranged in a vertical sequence, with some starting at the left edge and others indented. The lengths vary significantly, with some bars spanning most of the width and others being much shorter. The overall effect is a rhythmic, abstract pattern of black and white space.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

**VI. COUNT TWO: BREACH OF THE IMPLIED COVENANT OF GOOD**

**FAITH AND FAIR DEALING**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**VII. COUNT THREE: DISCRIMINATION UNDER THE AMERICANS**

**WITH DISABILITIES ACT (ADA)**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**VIII. COUNT FOUR: RETALIATION FOR REPORTING**

**DISCRIMINATION**

[REDACTED]

[REDACTED]

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**IX. COUNT FIVE: VIOLATION OF SECTION 504 OF THE  
REHABILITATION ACT**

[REDACTED]

[REDACTED]

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**X. COUNT SIX: INTENTIONAL INFLICTION OF EMOTIONAL  
DISTRESS (IIED)**

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**XI. COUNT SEVEN: NEGLIGENCE**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**XII. COUNT EIGHT: DEFAMATION (LIBEL AND SLANDER)**

[REDACTED]

[REDACTED]



A horizontal bar chart consisting of 12 black bars of varying lengths. The bars are arranged vertically, with some having significant gaps before them, suggesting a sequence or timeline. The lengths of the bars vary, with some being very short and others being nearly full-width.

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[REDACTED]

[REDACTED]

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[REDACTED]

**XV. COUNT ELEVEN: WRONGFUL TERMINATION**

[REDACTED]

[REDACTED]

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**XVI. COUNT TWELVE: VIOLATION OF THE FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA)**

[illegible]



[REDACTED]

[REDACTED]

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[REDACTED]

**XVII. COUNT THIRTEEN: DISPARATE TREATMENT UNDER STATE**

**ANTI-DISCRIMINATION LAWS**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**XVIII. COUNT FOURTEEN: FAILURE TO COMPLY WITH  
TENNESSEE'S COMPUTER-RELATED CRIMES STATUTES**

[REDACTED]

[REDACTED]

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**XIX. COUNT FIFTEEN: NEGLIGENT INFLICTION OF EMOTIONAL**

**DISTRESS**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[illegible]

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**XX. COUNT SIXTEEN: TORTIOUS INTERFERENCE WITH  
PROSPECTIVE BUSINESS RELATIONS**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



## XXI. CONCLUSION

[illegible]



[REDACTED]

**JURY DEMAND:**

[REDACTED]

Respectfully submitted,

*/s/ Ian Hunter Lucas*

**IAN HUNTER LUCAS**

Pro Se

Dated: March 12, 2024

221 Charleston Avenue

Pleasant View, TN, 37126

(910) 872-3577 (telephone)

ian.h.lucas@protonmail.com

ianhunterlucas@outlook.com

*Plaintiff Pro Se*

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**DECLARATION OF VERIFIED COMPLAINT**

I, Ian Hunter Lucas, declare as follows:

1. I am the Plaintiff in the above-captioned matter.
2. I have read the foregoing Verified Complaint and know the contents thereof.
3. The allegations contained therein are true and correct to the best of my knowledge, information, and belief.
4. I understand that by verifying this Complaint, I am swearing under penalty of perjury under the laws of the United States of America and the State of Tennessee that the foregoing is true and correct.

Executed on this 6th day of October, 2024, at Pleasant View, Tennessee.

Respectfully Submitted,  
/s/ Ian Hunter Lucas  
IAN HUNTER LUCAS  
Plaintiff Pro Se  
221 Charleston Avenue  
Pleasant View, TN 37146  
(910) 872-3577  
[ian.h.lucas@protonmail.com](mailto:ian.h.lucas@protonmail.com)  
[ianhunterlucas@outlook.com](mailto:ianhunterlucas@outlook.com)

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**NOTICE OF ELECTRONIC SIGNATURE**

In accordance with the applicable rules of the Circuit Court of Davidson County, Tennessee, and any relevant electronic filing protocols, this document includes the use of an electronic signature. The designation "/s/ Ian Hunter Lucas" serves as the legally binding equivalent of a handwritten signature for all purposes related to this filing.

By affixing this electronic signature, I, Ian Hunter Lucas, affirm under penalty of perjury that the contents of this document are true and correct to the best of my knowledge, information, and belief. This signature is executed in compliance with all statutory requirements and the rules governing electronic filings in this jurisdiction.

Dated this \_\_\_ day of \_\_\_\_\_, 2024.

Respectfully submitted,

/s/ Ian Hunter Lucas

IAN HUNTER LUCAS

Plaintiff Pro Se

221 Charleston Avenue

Pleasant View, TN 37146

(910) 872-3577

[ian.h.lucas@protonmail.com](mailto:ian.h.lucas@protonmail.com)

[ianhunterlucas@outlook.com](mailto:ianhunterlucas@outlook.com)

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of October, 2024, a true and correct copy of the foregoing Verified Complaint was filed under seal and is therefore not served upon any party until further notice by the Court.

Pursuant to the Court's order, and in compliance with 31 U.S.C. § 3730(b)(2), this document remains under seal and is subject to in-chamber review. Service upon the Defendants will be executed in accordance with the Court's directives once the seal is lifted.

Respectfully submitted,

/s/ Ian Hunter Lucas

IAN HUNTER LUCAS

Pro Se

221 Charleston Avenue

Pleasant View, TN 37146

(910) 872-3577

[ian.h.lucas@protonmail.com](mailto:ian.h.lucas@protonmail.com)

[ianhunterlucas@outlook.com](mailto:ianhunterlucas@outlook.com)